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MassCommute

c/o Northeast Transit
Planning & Management
28 Brook Road
Marblehead, MA 01945
(781) 639-6262 phone

www.masscommute.com

August 25, 2016

Via Electronic Mail: <http://www.regulations.gov>

The Honorable Anthony R. Foxx, Secretary
United States Department of Transportation
Docket Management Facility
U.S. Department of Transportation
1200 New Jersey Avenue SE.
Washington, DC 20590

RE: Metropolitan Planning Organization Coordination and Planning Area Reform
Docket Number: FHWA-2016-0016

Dear Secretary Fox,

I am writing on behalf of MassCommute to express our opposition to the U.S. Department of Transportation's (USDOT) Notice of Proposed Rulemaking (NPRM) on Metropolitan Planning Organization (MPO) Coordination and Planning Area Reform published on June 27, 2016.

MassCommute is a coalition of 14 Transportation Management Associations (TMAs) working with over 300 businesses, medical facilities, property managers, land developers and higher learning institutions in 42 municipalities across Massachusetts to promote & provide transportation options that reduce traffic congestion, improve air quality, and support opportunities for economic development. TMAs have served eastern Massachusetts, coordinated with and attended meetings at 3 MPOs (the Boston Region, the Merrimack Valley region, and the Northern Middlesex region) of the 11 MPOs in the Boston MPA since 1987, working with these organizations and their member communities to identify and support the implementation of transportation demand management (TDM) projects.

The NPRM's stated goal "...is to improve the transportation planning process by strengthening the coordination of MPOs and states and promoting the use of regional approaches to planning and decision making." We believe that implementing the proposed rule – which calls for combining MPOs to make one MPO within a Metropolitan Planning Area (MPA) or requiring more complex MPAs to have their MPOs work cooperative to develop a single Metropolitan Transportation Plan, a single Transportation Improvement Plan (TIP) and a single set of performance measures and targets, will actually weaken the high level of coordination and cooperation that currently exists in the Boston MPA.

Increased Planning Time & Cost/Reduced Local Input/No Measurable Benefit

MPOs are tasked with ensuring that governmental funds for transportation projects are distributed based on comprehensive, transparent, coordinated, and continuing planning practices. The current system allows for local priorities to be addressed thru the MPO planning process in coordination with representatives from the state DOT to develop a comprehensive statewide plan. This MPO planning process also includes coordination with priorities and projects of contiguous MPOs and those of contiguous states such as NH and RI. Implementation of the proposed rule will



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have an adverse impact on this current planning process – reducing the level of coordination and local input while increasing the time and cost to develop the transportation plan. As it the process currently exists there is a mix of local objectives, regional priorities, and interstate coordination leading to a high level of engagement and cooperation by stakeholders. As the MPO becomes larger and larger, presumably due to the interstate aspect of the MPA, the planning discussions will inevitably take place at the more political state planning level, further removing the local constituent voices from identifying and implementing projects that serve not just the major inner metropolitan area of the MPA, but serve to provide connectivity, access and spur economic development initiatives in smaller but important regions of the state.

The development of one MPO for the Boston MPA would result in the consolidation of 11 MPOs serving 388 towns, almost 9,000 miles, and more than 7 million people. An MPO of that size will reduce the opportunity for local input in plan development, increase staffing time and cost that will occur in the lengthy efforts to come to agreements that will most likely compromise the goals of individual MPOs and will most certainly leave gaps in connecting infrastructure between the smaller urban cores and their surrounding suburbs - some of which could impact traveler safety and certainly will have an impact on local travel commute times. For example - in the larger regional MPA approach, will representatives from Massachusetts and New Hampshire prioritize a bridge repair/replacement in Rhode Island?

Standardized Performance Measures & Targets Reduce Equity

The Boston MPA serves a three state region and has areas within it that are vastly different. Performance Measures and Targets that make sense in a large urban area such as Boston do not necessarily translate to areas in all three states that have small urban cores surrounded by their own suburbs with commuting patterns that are unique - based on geography and transportation resources to that area. The proposed rule will result in inequity in the distribution of funds with less money available for smaller communities that have real economic development needs that will suffer if a project serves an important local objective, but may not score high enough on MPA-wide performance measures (that are geared to more dense areas). For instance to use the example the Rhode Island bridge repair/replacement above, the standardized performance measures may not indicate enough throughput based on a performance measure that is more suited for greater Boston, but in reality this bridge may carry a third of the people traveling into a smaller Rhode Island urban core such as Woonsocket.

Recommendation

The Massachusetts MPO's are made up of local officials and transportation providers who are intimately familiar with the transportation network because they use it every day, and understand the goals and needs of their communities. The role of the Commonwealth is to coordinate local priorities into a cohesive transportation plan that supports Boston as the economic engine of the region, but also allows for a network of well maintained roads and bridges between smaller urban centers and their suburban counterparts to promote economic growth and disperse commute trips to these smaller hubs rather than have everyone commuting on major highways (or in some cases local roadways in an effort to avoid highway traffic and congestion) to Boston.



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The current coordination within MPOs by members, between contiguous MPOs (within the state and with those of contiguous states), and the coordinated project planning implemented at the state level through MassDOT and interstate level through coordination by MassDOT, RIDOT, and NHDOT allows local communities significant input and access to the transportation planning process. The efficiency and the ability to provide and maintain a road network that serves coordinated objectives of local, regional, and interstate projects in the Boston MPA obtained through the current planning process will be severely impacted if the proposed rule is implemented.

We hope that any modifications made to the current transportation planning process as a result of this NPRM for MPOs will take into account the need for a system that allows for robust planning and input on transportation programming and projects at the local level and does not lessen the current level of coordination and cooperation across the Boston MPA.

The U.S. is a large and diverse nation - Florida and Texas have different geography, populations, historic roadways, and economic objectives than California, the Mid-West, or the Mid-Atlantic and these characteristics are significantly different than that of New England. The same is also true of the Boston MPA and its very unique 11 MPOs. We hope that you reconsider the implementation of the proposed rule that will consolidate MPOs into one large MPO within the MPA or requiring more complex MPAs to have their MPOs work cooperative to develop a single Metropolitan Transportation Plan, a single Transportation Improvement Plan (TIP) and a single set of performance measures and targets with a corresponding single set of performance measures for the MPA. Rather we urge you to continue to refine current rules that provide for coordination and cooperation between MPOs within the MPA and performance measures that take into account the geography, population, and available infrastructure to ensure consistent and transparent performance measures are developed and applied within the MPOs that facilitate and help to bring about the larger MPA goals.

Sincerely,

Jeff Bennett
Managing Director

Julia Prange Wallerce
Executive Director

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